The Law Office of

Rehan Nazrali, Esq.

305 Broadway • 1/11/Floor • New York • NY 10007 • Tel: (646) 331-9378 • Fax: (646) 572-8768

USDC SDNY www.NazrafiLaw.com

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December 10, 2019

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BY ECF

Judge George B. Daniels United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

DEC 1 1 2019

The December 19, 2019 conference is adjourned to March 12, 2020 at 9:30 a.m.

SO ORDERED

HOM. GEORGE B. DANIELS

Re: Tounkara v. Rep of Senegal et al Civ. No. 19-CV-9029 (GBD)

Dear Honorable Judge Daniels:

The undersigned represents Plaintiff in the above-referenced action and writes this letter to request an adjournment of the initial pre-trial conference and a further extension of time to serve the remaining defendant, the Republic of Senegal. As such, defendants Permanent Mission of Senegal to the United Nations and Papa Gualo Ndiaye were both served on 11/25/2019 and have not filed any answers as of yet, thus making it impractical to hold the pre-trial conference on 12/19/2019. Accordingly, Plaintiff requests a 60 day adjournment so as to permit the served defendants to file their Answers or for Plaintiff to file a dispositive motion thereof.

Further, Plaintiff has reached out to the American Embassy in Senegal to obtain the information regarding process of service on the Republic of Senegal, not a party to the Hague Convention, and has been informed that process will be accepted by the Ministry of Interior. However, Plaintiff has not yet been able to obtain a name and or address from the Ministry of Interior and though counsel has made several attempts he has not yet been able to locate the person and place for service. Notwithstanding same, your affirmant is pursuing multiple sources of information in this matter and believes that he will be able to effectuate service within at least the next 90 days on defendant Republic of Senegal.

Accordingly, thus, Plaintiffs counsel respectfully requests a 60 day adjournment of the pre-trial conference and a further extension of at least 90 days to serve Defendant Republic of Senegal.

Respectfully,

<u>/S/</u>

Rehan Nazrali Esq